

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA

v.

JORGE SAYON

§
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§
§
§

NO. 1:20-CR-49(1)

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Indictment with a violation of 21 U.S.C. § 846, conspiracy to possess with the intent to distribute at least 400 grams or more of a mixture or substance containing fentanyl, a Schedule II controlled substance.

The essential elements which must be proven to establish the 21 U.S.C. § 846 violation are:

1. That two or more persons, directly or indirectly, reached an agreement to possess with intent to distribute fentanyl;
2. That the defendant knew of the unlawful purpose of the agreement;
3. That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and
4. That the overall scope of the conspiracy involved 400 grams or more of a mixture or substance containing fentanyl.

Respectfully submitted,

NICHOLAS J. GANJEI
ACTING UNITED STATES ATTORNEY

/s/ Christopher T. Rapp

CHRISTOPHER T. RAPP

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was delivered by electronic filing attorney for the defendant, on this the 17th day of August 2021.

/s/ Christopher T. Rapp

CHRISTOPHER T. RAPP

ASSISTANT U.S. ATTORNEY